

EXHIBIT 15

Memorandum of Activity

Case Number: I16A0120900	Office: Region 5 - Western (San Francisco)	Type of Activity: Interview
Date of Activity: 01/23/2024	Date Report Drafted: 02/01/2024	Location of Activity: Microsoft Teams
Subject of Activity: M.M.	Activity Conducted By (Name(s)): Reggie Lee	Signature: R L

On January 23, 2024, M.M., former skydiver, Parachute Center, was interviewed via Microsoft Teams by Special Agents Reggie Lee and Richard Ficarella, U.S. Department of Transportation, Office of Inspector General. Also present were Assistant U.S. Attorneys Kate Lydon and Dhruv Sharma, U.S. Attorney's Office, Eastern District of California. After being advised of the identities of the interviewing agents and the nature of the interview, M.M. provided the following information:

M.M. is an Australian citizen but has resided in Norway for the past five years. He assists with the local skydiving club while working as a freelance filmmaker.

M.M. first visited the Parachute Center in Lodi, California, in 2012 after hearing about it from a friend. Parachute Center was known for cheap jump tickets. He attended the Accelerated Freefall (AFF) course instructed by Mikey Knight and Blaine Muller. M.M. believed he spent approximately 2-3 weeks at the Parachute Center.

In 2014, M.M. returned to the Parachute Center and met Rob Pooley (Pooley) for the first time. Pooley was an experienced skydiver with 20 years of experience. M.M. spoke to Pooley about various camera equipment, but M.M. was not interested in being a Tandem Instructor at the time.

In 2016, M.M. stayed in California for approximately eight months. During the summer, M.M. became interested in pursuing a Tandem Instructor rating so that he could return to Australia and make more money. M.M. stopped by the Parachute Center and believed he spoke with Bill Dause (Dause) who referred M.M. to Pooley. Everyone knew Pooley was "the guy" that provided the Tandem Instructor course. M.M. spoke directly with Pooley in-person about getting his Tandem Instructor rating. M.M. paid approximately \$800 for the training (\$100 to Pooley and the rest to Dause) and he understood it was for the United States Parachute Association (USPA) and United Parachute Technologies (UPT)'s Tandem Instructor ratings.

M.M. was the only student in the Tandem Instructor course which lasted several days. The training consisted of reviewing manuals; learning the new rig; solo jump; three jumps with Mike Spurgeon (who was considered to be an expert); and six additional jumps with an experienced skydiver. Pooley explained the process to M.M., but M.M. could not recall any specifics other than that Pooley did not participate in any of M.M.'s jumps. M.M. could not recall receiving any hands-on instruction or training from Pooley and whether there was a test at the conclusion of the training.

M.M. stated that he went out of his way to complete the paperwork on his own from the computer at the Parachute Center. When he gave the completed paperwork to Pooley, Pooley gave M.M. set of paper from a stack that had already been pre-signed by Yuri Garmashov (Garmashov). At the time, M.M. did not think this was a big deal. Garmashov was not at the Parachute Center during M.M.'s training.

After Yong Kwon (Kwon)'s accident, M.M. realized why his ratings had been cancelled. M.M. could not recall

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Case 2:21-cr-00111-WBS Document 172-16 Filed 09/23/24 Page 3 of 4

if he reached out to USPA and UPT first or vice versa, but he learned that his ratings were cancelled because Pooley was not certified to provide Tandem Instructor training.

M.M. was later recertified at Skydive California by Ron Bell (Bell), USPA. M.M. found it reassuring that Bell spent several hours teaching emergency procedures in a structured format whereas Pooley's course was conversational and checklist oriented.

M.M. did not seek a refund from Pooley or Dause. He could not recall subsequent interactions with Pooley, Dause, or Garmashov following the accident. M.M. could not recall the names of other students who were at the Parachute Center for Tandem Instructor training.

M.M. stated he was unaware of Pooley's status as a Tandem Instructor Examiner at the time of his Tandem Instructor training and stated he would not have paid Dause and Pooley had he known Pooley's ratings were suspended at the time.

In one of M.M.'s visit to the Parachute Center, he survived an aircraft crash while attempting to skydive. The aircraft suffered engine issues at 1500 feet and crash landed in a vineyard. M.M. experiences post-traumatic stress from this incident to this day.

M.M. viewed the following documents:

POOLEY_00026305 - M.M. could not recall why he received a PayPal payment from the Parachute Center. He stated that he may have been cellphone less at the time and skydivers used Parachute Center for favors.

POOLEY_00020892 - M.M. could not recall this email.

POOLEY_00026308-00026310 - M.M. was frustrated that it was taking so long to get his rating. Pooley was rumored to mishandle paperwork, so M.M. wanted to stay on top of Pooley.

POOLEY_00020239-00020240 - After reviewing the attachments, M.M. confirmed his signatures. The date inconsistencies may be due to prerequisite training he had prior to Pooley's but was unsure. As for training dates that was postdated, M.M. was not sure why it was filled that way. M.M. stated he would have never postdated his training dates.

POOLEY_00020238 - M.M. believed he forwarded this email to Garmashov to provide him with evidence showing that Pooley had forged his signature.

Following the interview, M.M. was emailed a copy of the trial subpoena. In addition, he emailed the following attachment:

- Aug 2, 2016 - Tandem Rating for M.M. #265156

On February 14, 2024, the reporting agent updated to add the following information:

M.M. knew why his rating had been cancelled given the fatality he learned about on the news. When asked why M.M. did not seek a refund, he stated he was more focused on the fact that two people died.

M.M. recalled Bell's re-training was like a military boot camp. M.M. described exercises where M.M. laid down and Bell yelled out a malfunction and M.M. drilled it for hours.

M.M. knew Kwon though they were not close friends but acquaintances. They had beers together at the Parachute Center and may have jumped together. M.M. did not speak to Kwon about his training with Pooley.

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Reviewed By (Initials): C L Date: 02/18/2024

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